

In re:
Ramona Lee Taylor
Debtor

Case No. 21-10845-mdc
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2
Date Rcvd: Oct 04, 2023

User: admin
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 06, 2023:

Recip ID	Recipient Name and Address
db	+ Ramona Lee Taylor, 825 Lafayette St., Coatesville, PA 19320-2626

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 06, 2023

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 4, 2023 at the address(es) listed below:

Name	Email Address
ANTHONY A. FRIGO	on behalf of Debtor Ramona Lee Taylor anthonyfrigo@msn.com frigoar70666@notify.bestcase.com
DENISE ELIZABETH CARLON	on behalf of Creditor FEDERAL HOME LOAN MORTGAGE CORPORATION bkgroup@kmlawgroup.com
DENISE ELIZABETH CARLON	on behalf of Creditor Federal Home Loan Mortgage Corporation as Trustee for the benefit of the Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2019-3 bkgroup@kmlawgroup.com
JAMES RANDOLPH WOOD	on behalf of Creditor Township of Valley jwood@portnoffonline.com jwood@ecf.inforuptcy.com
JOSHUA I. GOLDMAN	on behalf of Creditor Legacy Mortgage Asset Trust 2019-GS6 Josh.Goldman@padgettlawgroup.com angelica.reyes@padgettlawgroup.com;bkecf@padgettlawgroup.com;josh.goldman@ecf.CourtDrive.com

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KENNETH E. WEST

ecfemails@ph13trustee.com philaecf@gmail.com

KERI P EBECK

on behalf of Creditor Regional Acceptance Corporation kebeck@bernsteinlaw.com
jdryer@bernsteinlaw.com;kebeck@ecf.courtdrive.com

MICHAEL PATRICK FARRINGTON

on behalf of Creditor Federal Home Loan Mortgage Corporation as Trustee for the benefit of the Freddie Mac Seasoned Credit
Risk Transfer Trust, Series 2019-3 mfarrington@kmlawgroup.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 9

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ramona Lee Taylor : Chapter 13
: No. 21-10845-mdc

MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION

Ramona Lee Taylor, Debtor, by and through counsel, Anthony A. Frigo, Esquire, respectfully requests this Honorable Court to Modify her Chapter 13 Plan and in support thereof aver as follows:

JURSDICTION AND VENUE

1. This case was filed under Chapter 13 on March 31, 2021.
2. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b).

This is a core proceeding pursuant to 28 U.S.C. C 157 (b)(2)(A),(B),and (O).
3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408-and 1409.
4. The statutory predicate for the relief requested is § 105 of the Bankruptcy Code.

MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION

5. This case was filed under Chapter 13 on March 31, 2021.
6. William C. Miller, Esquire, was appointed the Standing Chapter 13 Trustee.
7. Due to the retirement of William C. Miller, Kenneth e. West is the current Chapter 13 Standing Trustee.
8. The Debtor' Chapter 13 Plan was confirmed on February 17, 2022.
9. Debtor's Chapter 13 Plan sought the payment of Priority Claims for Unpaid attorney fees in the amount of \$2,500.00.
10. Debtor's Chapter 13 Plan sought a distribution to unsecured claims in the amount of \$81.39.

11. Debtor's Chapter 13 Plan sought a distribution to cure defaults in the amount of \$9,473.54.
12. Debtor's Chapter 13 Plan sought a distribution to secured claims in the amount of \$13,700.88.
13. Debtors confirmed Plan is a forty-nine (49) month plan with a base amount of \$28,608.52.
14. To date the Debtor has paid \$13,300.46 toward the plan leaving a balance due of \$15,308.06.
15. The plan proposed an increase in payments from \$506.46 to \$700.00 in month 20.
16. Debtor had forgotten that the increase was due and fell behind on plan payments. The current arrearage is \$2,008.11.
17. By her proposed amended plan, Debtor, Ramona Lee Taylor, seeks to increase the plan period from forty-nine months (49) to fifty-two months (52) at the rate of \$700.00 per month for twenty-two months and a single payment of \$660.06 in month fifty-three (53).
(A true and correct copy of the Proposed Amended Plan is attached hereto, made a part hereof and marked as Exhibit "A".)
18. Bankruptcy rule 1329(b) states:

“a) At any time after confirmation of the plan but before the completion of payments under such plan, the plan may be modified, upon request of the debtor, the trustee, or the holder of an allowed unsecured claim, to—

....

(2) extend or reduce the time for such payments;”

19. The rule allows for the extension of time to complete the plan and receive a discharge.

The balance of this page is intentionally left blank.

20. Grant of this motion to modify the plan is in the best interest of the parties.

21.

WHEREFORE, Debtor respectfully requests the entry of an Order in the form attached hereto.

Dated: October 4, 2023

/s/ Anthony A. Frigo, Esquire

Anthony A. Frigo, Esquire

Attorney for Debtor

175 Strafford Ave., Suite One

Wayne, PA 19087

610.687.7784